

### *Introduction*

- Are you currently working?
- Where do you work?
- What is your position?
- How long have you been a special agent at SDNY?
- What did you do before that?
- What kind of cases do you investigate?
- What are some of your job responsibilities?

### *Gmail Chart*

- READ GOOGLE STIPULATION
- I'm showing you what has been admitted pursuant to stipulation as GX and GX.
- In general, what kind of evidence is this?
- What is an email preservation?
- Approximately how many emails are in each preservation?
- Were you asked to perform any searches of GX and GX?
- What kind of searches?
- I'm showing you what has been marked as GX through GX. Can you identify these exhibits?
- Does exhibits GX and GC fairly summarize the results of your search of GX and GX?
- The People offer GX.
- I'm displaying GX to the jury.
- *Explain each gmail chart*
  - *Year comparison*
  - *MCU key word*
  - *Guagliardo comparison*
  - *Wong comparison*
  - *ACH comparison*

### *Chase Chart*

- READ CHASE STIPULATION
- I'm showing you what has been admitted pursuant to stipulation as GX and GX.
- In general, what kind of evidence is this?
- Approximately how many pages are included in GX?
- Who is account holder?
- What is account number?
- Were you asked to search GX for particular entries? What
- I'm showing you what has been marked as GX .
- Does exhibits GX fairly summarize the results of your search of GX?
- The People offer GX.
- I'm displaying GX to the jury.
- *Explain Chase chart*
  - *Do ACH emails from Gmail match Chase records? DO they match GX#463?*

*Phone and Text Chart*

- READ VERIZON and AT&T STIPULATION
- I'm showing you what has been admitted pursuant to stipulation as GX and GX.
- In general, what kind of evidence is this?
- What phone number is the Verizon records for?
- What phone number is the T-Mobile records for?
- Approximately how many pages are included in GX and GX?
- I'm showing you GX#235 (contact cards for guagliardo, wong, ash). Read to jury
- Were you asked to search GX and GX for particular phone numbers?
- Did you focus on a date range?
- I'm showing you what has been marked as GX .
- Does exhibits GX fairly summarize the results of your search of GX and GX?
- The People offer GX.
- I'm displaying GX to the jury.
- *Explain phone and text chart*
- *Explain time conversion*

1099 Stipulation

- What is a 1099?

Cablevision Stipulation

- Read account number and name.
- Show GX#463 – does account match

T-Mobile Stipulation

- Read account number and name.
- Show GX#463 – does account match

PBA

- I'm showing you GX (PBA text message)
- Based on your law enforcement experiences, do you know what a PBA card is?

OATH emails

- Read OATH Stipulation
- Were there any Guagliardo emails in this email account?